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10/07/2004 09:41 AM

To

Subject

CRS Site Group Response to USEPA August 18 Comments re  
seeps

Ms. Massenburg,

Attached please find the Chemical Recovery Systems, Inc. (CRS) Site Group Response to USEPA's August 18, 2004 comments on the Human Health Risk Assessment Summary sections contending that no groundwater seeps have been detected at the facility. The response includes a word document and an attached picture. If you have any difficulty viewing these documents please contact me directly at the numbers below.

<<Response to USEPA Concern re seeps2.doc>> <<Response to USEPA comment re seeps  
photograph.ppt>>

We appreciate the opportunity to address the agency's issues and concerns in this less formal electronic give and take. You will be receiving the CRS Site Draft Remedial Investigation Report in the next few days, which will also address this issue.

Sincerely,

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Response to USEPA Concern re seeps2.doc



Response to USEPA comment re seeps photograph.ppt

US EPA RECORDS CENTER REGION 5



467681

**Chemical Recovery Systems, Inc. (CRS) Site Group  
Response to E-mailed Comments  
from Gwen Massenburg, RPM, U.S. EPA Region 5  
(Received 18 August 2004)**

**Comment 1:**

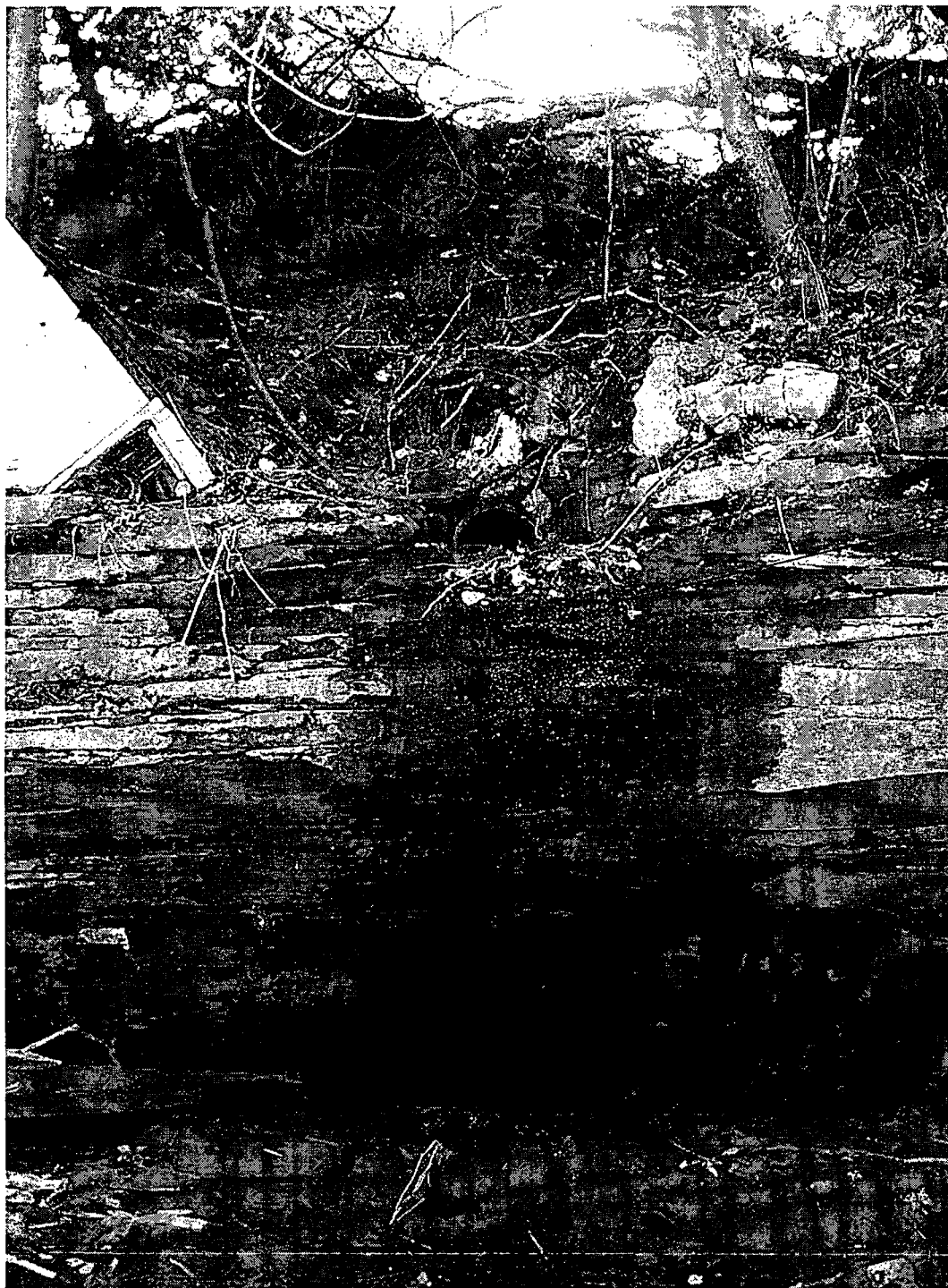
EPA is raising concern over the response to comments relating to potential seeps on the property and on the river bank, see EPA's comments: Section 2.2, Human Health Risk Assessment Summary, page 5 of 20, comment #3, and Section 2.4, page 9 of 20, paragraph 2. EPA does not believe that the issue involving groundwater seepage in the following two locations have been fully characterized and/or evaluated: location one, on the river bank along the northwestern stretch of the site which is covered with concrete debris that was presumably pushed over at some point to stabilize the slope. The bedrock elevation map show bedrock is deeper in that portion of the site, and a small amount of groundwater was encountered in GP-6, and perhaps, someone felt the need to use concrete debris to stabilize the slope, there's a good possibility that seeps are in that vicinity; and location two, there appears to be seepage from the bedding planes in the sandstone as well as discharge from the 12" pipe. See the attached photograph made by EPA's oversight contractor. The response given to EPA states " that no groundwater seeps have been detected at the facility."

EPA request that the areas mention above be evaluated during the human health and the ecologically risk assessment, and too consider the bedding pane seepage during the design phase when you are considering how to finish off the slope.

**Response:**

A site visit was conducted on 23 August 2004 by the Parsons Project Manager and Senior Hydrogeologist and a review of the River bank indicated that there was no free-flowing water emanating from the bedrock and/or slope, other than what can be attributed to the limited flow from or around the circumference of the 12-inch pipe. Water was not observed emanating from beneath the debris associated with "location one." The majority of limited water observed in "location two" can be attributed to the 12-inch pipe (see attached picture). The 12-inch pipe is not the city storm sewer. Moisture was observed in a few bedrock bedding planes, however, there was no free-flowing water and there is not a sufficient quantity of water for sample collection.

The risk assessment will be amended to indicate there is a possibility that there may be a minor unquantifiable volume of water emanating from bedrock and/or slope at the above locations. As the volume of water is unquantifiable, potential exposure to the water will be qualitatively evaluated in the risk assessment. Piping protrusions along the River, with the exception of the city storm sewer, will be addressed in the remedial design and pulled and/or plugged as warranted.



Limited water flow  
from 12-inch pipe

Water sweating  
from bedding planes